

Supplier Code of Conduct on Modern Slavery

This policy defines both [X Hotel's] minimum standards and the basic principles of cooperation that we require of all suppliers, whether they supply goods, services or people.

1. Employment
 - 1.1 There are no victims of modern slavery working in any part of the supply chain who have been recruited, transported, transferred, harboured or received for the purposes of exploitation.
 - 1.2 There is no forced, bonded, indentured or involuntary prison labour.
 - 1.3 Workers are not required to pay fees, either directly or indirectly to obtain work, or lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.
 - 1.4 No offence under the Modern Slavery Act 2015, the Immigration Act 2016, and any Gangmasters Licensing Authority regulation will be committed.
 - 1.5 Workers shall have their terms of their employment set out in a written document that is easily understandable to them and which clearly sets out their rights and obligations. This document shall include, but not limited to, transparent terms with respect to wages, overtime pay, payment period, working hours and rights, holiday pay. The terms should be provided to the worker in advance of employment and in a language the worker understands.
2. Freedom of Association and Employee Voice
 - 2.1 Workers, without distinction, have the right to join or form trade unions or other comparable, legal organisations of their own choosing. We recognise their ability to communicate their employee voice and will provide reasonable opportunities for them to do so.
3. Working conditions
 - 3.1 A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry, any specific hazards and legal requirements in line with internationally recognised certification and standards.

- 3.2 A record of health and safety incidents (accidents and injuries) shall be maintained with an action plan to improve performance by minimising the causes of hazards in the working environment.
- 3.3 Workers receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- 3.4 Access is provided to clean toilet facilities, potable water, and sanitary food storage.
- 3.5 Responsibility for health and safety is assigned to a senior management representative.
- 3.6 Facilities will undergo an environmental and safety risk assessment and have all required documentation and permits regarding structural, electrical and fire safety

4. Child labour

- 4.1 Suppliers may not employ workers under the age of 15 or as indicated by local law, whichever is the higher.
- 4.2 Suppliers must maintain formal documentation that verifies the age of each worker.
- 4.3 Suppliers must comply with all relevant child labour laws.
- 4.4 Suppliers shall contribute to programmes which provide for the transition of child labour to education, or support our efforts to do so.
- 4.5 Young persons under 18 shall not be employed at night, in hazardous conditions and suppliers must comply with all international and national laws regulating young workers including educational opportunities.

5. Fair Wages

- 5.1 Wages and all legally mandated benefits paid for regular hours of work meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 5.2 Overtime must be paid at a premium rate, at a minimum compliant with national legislation.
- 5.3 Wages shall be paid directly to the workers in the form of cash or cheques or into a nominated bank account, at the agreed intervals and in full.¹

¹ N.B. Where all possible, payment of wages in cash should be avoided as this can be an indicator of modern slavery

- 5.4 All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and provided with wage slips including the particulars of their wages for the pay period concerned each time that they are paid.
- 5.5 Deductions from wages as a disciplinary measure shall not be permitted nor shall deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

6. Working hours and annual leave

- 6.1 Working hours must comply with national laws and industry standards.
- 6.2 Workers shall be provided with at least one day off for every seven day period on average.
- 6.3 Overtime must be voluntary, must not average more than 12 hours per week, and must not be undertaken on a regular basis.
- 6.4 Workers may refuse to work overtime without any disciplinary action being taken against them.
- 6.5 Reasonable annual leave must be afforded to each employee, based on a clear, formal policy.²

7. Discrimination

- 7.1 Suppliers will fully comply with local laws regarding equality of employment opportunities.
- 7.2 Subject only to local law, suppliers will practise no discrimination in hiring, compensation, training, promotion, termination or retirement based on race, caste, nationality, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- 7.3 If the supplier feels that cultural or structural discrimination exists that is beyond its ability to control, then this should be recorded and reported to us. A collaborative approach will be taken to resolve the issue in a manner that is sensitive to the cultural and social context

² ILO Convention concerning Annual Holidays with Pay (Revised) 1970 states that for a one year term of service, paid annual leave shall not amount to less than three weeks.

8. Regular employment

- 8.1 Work performed must be on the basis of a recognised employment relationship established through national law and practice.
- 8.2 Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.
- 8.3 Migrant, contract, part-time and home-workers must receive the same rights, benefits and opportunities for advancement as other workers performing similar activities.

9. Humane treatment

- 9.1 Physical and verbal abuse, the threat of physical abuse, sexual harassment or other forms of intimidation to the worker, their families and those closely associated with them, shall be prohibited.
- 9.2 Disciplinary actions must be fair, proportionate and fully compliant with local laws.
- 9.3 All disciplinary actions must be recorded.
- 9.4 Suppliers will record any incidence of harsh or inhumane treatment and develop action plans to prevent future violations.
- 9.5 Suppliers will develop a whistle-blowing process for their workers.
- 9.6 Workers should be free to file grievances to their employers about the employer's treatment of them and workers shall not suffer detriment, retaliation or victimisation due to raising this grievance.

10. Accommodations³

- 10.1 Any accommodation facilities provided to employees must meet all local laws and regulations covering health, sanitation, electrical, mechanical, fire and structural safety.

³ Accommodation can often be used as a mechanism to control exploited labourers.

- 10.2 An evacuation plan must be prominently displayed at any accommodation facilities provided to employees.
- 10.3 Accommodation facilities should have been designed and built for human habitation.
- 10.4 Facilities should be away from main factory and production buildings.
- 10.5 Charges for rent and food must be reasonable and benchmarked against local cost and wage levels.
- 10.6 Each worker must be provided with an individual sleeping bed.
- 10.7 Sleeping quarters should be segregated by gender, as appropriate
- 10.8 Workers must be provided with adequate and lockable storage space.
- 10.9 Sleeping quarters must have adequate lighting.
- 10.10 Appropriate quarters must be provided for couples.
- 10.11 The living space per worker must be the minimum legal requirement or the local industry standard whichever is greater.
- 10.12 Workers must be allowed to leave and enter freely during time off work subject to reasonable restrictions imposed based on considerations of safety.
- 10.13 Accommodation must include access to potable water.
- 10.14 Workers must be provided with adequate recreational facilities.
- 10.15 Adequate toilet and shower facilities must be provided, segregated by gender and maintained in a hygienic condition.

11. Ethical Corporate Practices

- 11.1 All relevant national and international legal requirements must be complied with.
- 11.2 [X Hotel] must be informed of any serious breaches of compliance or investigations by authorities into potential breaches.
- 11.3 Suppliers must not take part in:
 - 11.3.1 Money laundering.
 - 11.3.2 Insider trading.
 - 11.3.3 Fraud, bribery and corruption and other improper payments or gifts.
 - 11.3.4 Unauthorised access to personal and business information.
- 11.4 Suppliers will adhere to the principle of free, prior and informed consent of local and indigenous communities where sourcing takes place, ensuring rights and access to land is not abused.
- 11.5 Suppliers are required to act in accordance with the UK Bribery Act.

12. [X Hotel] requires its suppliers to advise and keep us updated on all suppliers used for the production and processing of our hotel goods and services and, further, to commit to:
- Communicate the Supplier Code of Conduct to all employees, suppliers, sub-contractors, home workers, and temporary and contract staff engaged in their supply chain.
 - Ensure this Supplier Code of Conduct complies with all applicable laws in the countries in which they operate and all relevant ILO conventions, UN Guiding Principles on Business and Human Rights and the UK Bribery Act. Where standards differ, the standard which offers the greater degree of protection to workers shall apply.
 - Establish management systems for delivering compliance with this Supplier Code of Conduct.
 - Maintain records demonstrating compliance. An individual in a senior management position should be given responsibility for compliance with the Supplier Code of Conduct.
 - Train relevant staff on social, ethical, environmental and human rights standards to support compliance with this Supplier Code of Conduct.
 - Allow hotel representatives access to documentation, management and workers to determine progress against compliance with this Supplier Code of Conduct.
 - Report any serious breaches of this Supplier Code of Conduct to the relevant hotel representative.

In addition, suppliers may be required to comply with additional sub-policies or standards relevant to the products that we source from that supplier and specific risks or issues associated.

Signed Declaration by Supplier

I declare that I have received and acknowledged in full the Supplier Code of Conduct and agree to work with [X Hotel] to work towards full compliance abiding by the Principles of Implementation.

Signed:

Title: [Company representative]

Date:

On behalf of: [Company name]